

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

BETHANY BROWN,

Plaintiff,

Case No. 1:18-cv-00708

v.

Hon. Robert J. Jonker

M.G.H. FAMILY HEALTH CENTER,  
d/b/a MUSKEGON FAMILY CARE,

Defendant.

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**PLAINTIFF'S PRELIMINARY LAY WITNESS LIST**

Now Comes Plaintiff, Bethany Brown, by and through her attorneys, Blanchard & Walker, PLLC, to identify lay witnesses that may be called to testify at trial for the above-captioned matter. This preliminary lay witness list is based on information reasonably available to Plaintiff at this time. Plaintiff expressly reserves the right to change, modify, supplement or clarify her preliminary lay witness list herein at any time before trial and in accordance with the Court's orders. Plaintiff's

Preliminary Lay Witness List represents a good faith effort to identify potential witnesses that may be called at trial to support her claims without being served with written discovery responses or relevant documents from Defendant.

1. Bethany Brown, Plaintiff  
c/o Counsel of Record

Information relevant to her own claims, including her job duties, performance evaluations, organizing activity, disciplinary actions and constructive discharge of employment. In addition, Ms. Brown may testify about her damages as a result of Defendant's unlawful actions.

2. Sheila Bridges  
MFC CEO  
c/o Counsel of Record

Information relevant to Plaintiff's claims and Defendant's defenses, including Plaintiff's employment, her job duties, her termination, and her communications and interactions with others regarding her employment.

3. Regina Watkins, LPN  
Unknown Address

Information relevant to Plaintiff's claims and Defendant's defenses, including Plaintiff's employment, her job duties, her termination, and her communications and interactions with others regarding her employment.

4. Amber Shull, PA-C  
Unknown Address

Information relevant to Plaintiff's claims and Defendant's defenses, including Plaintiff's employment, her job duties, her termination, and her communications and interactions with others regarding her employment.

5. Nicole Bradford, PA-C  
Unknown Address

Information relevant to Plaintiff's claims and Defendant's defenses, including Plaintiff's employment, her job duties, her termination, and her communications and interactions with others regarding her employment.

6. Dr. Thomas McCurdy  
c/o Counsel of Record

Information relevant to Plaintiff's claims and Defendant's defenses, including Plaintiff's employment, her job duties, her termination, and her communications and interactions with others regarding her employment.

7. Tom Lufkin  
Executive Director for MFC  
c/o Counsel of Record

Information relevant to Plaintiff's claims and Defendant's defenses, including Plaintiff's employment, her job duties, her termination, and her communications and interactions with others regarding her employment.

8. Emmitt Davis  
HR Director for MFC  
c/o Counsel of Record

Information relevant to Plaintiff's claims and Defendant's defenses, including Plaintiff's employment, her job duties, her termination, and her communications and interactions with others regarding her employment.

9. Lisa Santos  
MFC Clinic Manager  
c/o Counsel of Record

Information relevant to Plaintiff's claims and Defendant's defenses, including Plaintiff's employment, her job duties, her termination, and

her communications and interactions with others regarding her employment.

10. Cora Russ  
MFC Credentialing Specialist  
c/o Counsel of Record

Information relevant to Plaintiff's claims and Defendant's defenses, including Plaintiff's employment, her job duties, her termination, and her communications and interactions with others regarding her employment.

11. Dr. F. Remington Sprague  
Mercy Health Muskegon Chief Medical Director

Information relevant to Plaintiff's claims and Defendant's defenses, including Plaintiff's employment, her job duties, her termination, and her communications and interactions with others regarding her employment.

12. Dr. Carlos Merritt  
MFC Medical Director  
c/o Counsel of Record

Information relevant to Plaintiff's claims and Defendant's defenses, including Plaintiff's employment, her job duties, her termination, and her communications and interactions with others regarding her employment.

13. Dr. Joan Nagelkirk  
Mercy Health Credentials Chair

Information relevant to Plaintiff's claims and Defendant's defenses, including Plaintiff's employment, her job duties, her termination, and her communications and interactions with others regarding her employment.

14. Dr. Robert Hoogstra  
Associate Medical Director, Quality and Safety

Information relevant to Plaintiff's claims and Defendant's defenses, including Plaintiff's employment, her job duties, her termination, and her communications and interactions with others regarding her employment.

15. Anna Gonzales  
Health Resources and Services Administration

Information relevant to Plaintiff's claims and Defendant's defenses.

16. Julie Hayes  
Health Resources and Services Administration

Information relevant to Plaintiff's claims and Defendant's defenses.

17. Rick Wilk  
Health Resources and Services Administration

Information relevant to Plaintiff's claims and Defendant's defenses.

18. Records Custodian  
MGH Family Health Center, Inc. d/b/a Muskegon Family Care  
c/o Counsel of Record

To authenticate any documents (and potential trial exhibits) produced by the HRSA in response to subpoenas, freedom of information act requests, and discovery responses made in this lawsuit.

19. Records Custodian  
Health Resources and Services Administration

20. Records Custodian  
National Labor Relations Board  
110 Michigan St., NW #299  
Grand Rapids, MI 49503  
(616) 456-2679

To authenticate any documents (and potential trial exhibits) produced by the HRSA in response to subpoenas, freedom of information act requests, and discovery responses made in this lawsuit.

21. Records Custodian  
Michigan LARA  
Lansing, MI

To authenticate any documents (and potential trial exhibits) produced by the HRSA in response to subpoenas, freedom of information act requests, and discovery responses made in this lawsuit.

22. Records Custodian  
U.S. DHHS  
Office of Inspector General  
330 Independence Ave., SW  
Room 5409  
Washington, DC 20201

To authenticate any documents (and potential trial exhibits) produced by the HRSA in response to subpoenas, freedom of information act requests, and discovery responses made in this lawsuit.

23. Records Custodian  
Internal Revenue Service

To authenticate any documents (and potential trial exhibits) produced by the HRSA in response to subpoenas, freedom of information act requests, and discovery responses made in this lawsuit.

24. Records Custodian  
Michigan Dept. of Treasury  
Lansing, MI

To authenticate any documents (and potential trial exhibits) produced by the HRSA in response to subpoenas, freedom of information act requests, and discovery responses made in this lawsuit.

25. Records Custodian  
Plaintiff's Tax Preparer(s)

To authenticate any documents (and potential trial exhibits) produced by the HRSA in response to subpoenas, freedom of information act requests, and discovery responses made in this lawsuit.

26. Records Custodian  
Social Security Administration

To authenticate any documents (and potential trial exhibits) produced by the HRSA in response to subpoenas, freedom of information act requests, and discovery responses made in this lawsuit.

27. Any and all officers, managers, supervisors and other employees that have information relevant to Defendant's human resource, payroll, benefits and operational policies, procedures and practices concerning all allegations raised in the Complaint.
28. Any lay witnesses that would be able to testify about the damages of Plaintiff, as they are disclosed through discovery.
29. Any witnesses identified on Defendant's Witness List or Defendant's Initial Disclosures.
30. Any rebuttal or impeachment witnesses, if necessary.
31. Any foundational witnesses, as necessary.
32. All employees, agents or representatives of Defendant that have knowledge of the subject matter of this lawsuit.
33. All individuals who have been referred to in the pleadings of this lawsuit, but have not been specifically identified at this point.
34. All persons or entities referred to in discovery via depositions, interrogatories, answers to interrogatories, requests and responses to requests for documents and subpoenas.

Plaintiff reserves the right to amend her preliminary lay witness list, as necessary, pursuant to further discovery.

Respectfully submitted,  
BLANCHARD & WALKER, PLLC

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hollander@bwlawonline.com

Dated: November 5, 2018

**CERTIFICATE OF SERVICE**

I, hereby certify that on November 5, 2018, my paralegal, Natalie Walter, electronically filed the foregoing paper with the Clerk of the Court using the ECF system, whereupon it is electronically served on all counsel of record.

Respectfully submitted,  
BLANCHARD & WALKER, PLLC

/s/ David M. Blanchard  
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